

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DELTON GOODRUM

Plaintiff,

v.

CITY OF ALEXANDRIA, a municipal.
Corporation of Virginia

Defendant.

Case No. 1:24-cv-01111 (PTG/WEF)

DECLARATION OF LIEUTENANT DELTON GOODRUM

I, Lieutenant Delton Goodrum, declare as follows:

1. My name is Delton Goodrum, and I am the plaintiff in the instant matter.
2. I am over the age of eighteen (18) and have personal knowledge of the facts declared within.
3. On June 30, 2021, I attended a Lieutenant's meeting wherein Acting Chief Don Hayes announced he had selected me for future promotion to Captain for purposes of diversity, prompting accusations from my colleagues that Hayes had chosen to promote me solely because I am Black.
4. I am confident this meeting occurred on June 30, 2021 based on the calendar invitation for the meeting attached to this declaration as Exhibit A-1.
5. I am confident that Hayes served in the role of Acting Chief on the date of the Lieutenant's meeting referenced above. Please see Exhibit A-2, an email signed by Don Hayes as Acting Chief on June 30, 2021.
6. I have extensive experience in criminal investigations from my twenty-five (29) years of service with the Department
7. The Criminal Investigations Division (CID) is part of the Investigation Bureau of the Alexandria Police Department which encompasses the Department's detectives.
8. I served as the Division's Vice and Narcotics Commander for two years, from 2015 – 2017.

9. Vice and Narcotics is one of the highest-liability sections within the Department and bears a high degree of responsibility. If mistakes were made in my position, they would carry the risk of jeopardizing the career of the then-Chief of Police, Earl Cook. Then-Chief Cook met with me when I accepted this role to express his confidence that I could handle the responsibility.
10. As Vice and Narcotics Commander, I oversaw the day-to-day administration and field operations of the section, which included undercover operations, security of confidential informant files, oversight of a significant amount of buy-money, as well as the security of weapons and narcotics within the building we worked from in addition to security of the building itself. I also handled budgetary responsibilities in this role.
11. During my time as Vice and Narcotics Commander, I completed a comprehensive assessment of our section to enhance the safety of both detectives and suspects during undercover operations. At least three of the recommendations I made following this assessment were adopted by the Department and remain in place today.
12. In 2017, I transferred from Vice and Narcotics and became the Department's Special Operations Team Commander. Special Operations Team is the Department's term for what is commonly called SWAT or Special Weapons and Tactics. That position is both high risk and high responsibility. I served in that capacity for approximately four (4) years and only received praise for my performance.
13. I currently work in the Investigation Bureau as the commander of the Department's CSI, Latent Print Examiners, and Digital Forensics Lab. From February 2024 until October 2024, I bore the additional responsibility of commanding Vice and Narcotics after the Lieutenant within Vice and Narcotics was pulled to serve as Acting Captain in the Patrol Division. I covered both sections at the same time, fulfilling the role of two Lieutenants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 26/02/25, 2025.

Delton Goodrum
Delton Goodrum

Declaration of Delton Goodrum vWitness Review - Revised - 2

Final Audit Report

2025-02-26

Created:	2025-02-26
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"Declaration of Delton Goodrum vWitness Review - Revised - 2" History

-  Document created by Joshua Erlich (jerlich@erlichlawoffice.com)
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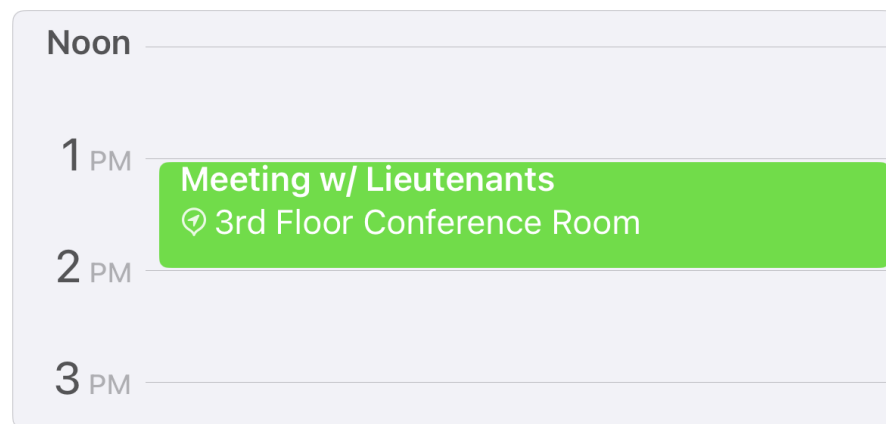


Adobe Acrobat Sign

EXHIBIT A-1

 **Back****Event Details****Meeting w/ Lieutenants**

3rd Floor Conference Room

Wednesday, Jun 30, 2021
from 1 PM to 2 PMPropose New Time 

Calendar

 CalendarInvitation from
Don Hayes

Invitees

15 

- ✓ Steven Carr
- ✓ Biruk Dessalegn
- ✓ Delton Goodrum
- ✓ Liz Magyar
- ✓ Tara May
- ✓ Edward Milner
- ✓ Jason North

Accept

Maybe

Decline

EXHIBIT A-2



Joshua Erlich <jerlich@erlichlawoffice.com>

Fwd: Reminder: Noise Complaint Response

1 message



From: Don Hayes <Don.Hayes@alexandriava.gov>
Sent: Wednesday, June 30, 2021 9:19 AM
To: Police Staff <Police.Staff@alexandriava.gov>
Cc: Douglas Campbell <douglas.campbell@alexandriava.gov>; Renee Gordon <Renee.Gordon@alexandriava.gov>
Subject: Reminder: Noise Complaint Response

On May 15, 2021 the City Council adopted changes to the Alexandria Noise Ordinance to remove any provisions in the ordinance that were unconstitutional pursuant to the Virginia Supreme Court Ruling in Tanner v. Virginia Beach. Therefore, the City's ordinance is now fully enforceable as written. However, in order to comply with the vagueness standard, the criteria in the ordinance are required to be more objective which make enforcement difficult without a noise meter.



- [REDACTED]
- [REDACTED]
- [REDACTED]

As a reminder this is only a temporary posture and we will continue to reimagine policing and involve other agencies in the solutions to the everyday challenges we have been asked to address in the city where we work. Thank you for your willingness to play a role in our effort to tackle this issue. I will keep you updated on our progress within the staff workgroup.

Acting Chief Don Hayes

Alexandria Police Department

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 Six Steps to Stop the Spread image---